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INSTRUCTIONS AND DEFINITIONS

A. Instructions

1. These interrogatories impose a continuing obligation to respond and to provide additional information as it becomes available.
2. If no information or documents are responsive to any of these interrogatories, please indicate the lack of responsive information or documents.
3. For each interrogatory, please identify the preparer or the person who supervised the response.
4. Please specify the interrogatory to which each document applies. If a document or narrative response applies to more than one interrogatory, please provide a cross reference.
5. For an interrogatory calling for the production of documents, please provide legible, true and complete copies of the documents. If a responsive document has been lost or destroyed, or is otherwise unavailable, please follow Instruction 11 below.
6. Where an interrogatory solicits a narrative response rather than the production of documents alone, a narrative response is required and the production of documents does not substitute for a narrative response.
7. These interrogatories are to be construed broadly to elicit all requested information which is discoverable under the Commission's Rules of Practice. Accordingly,
 - (a) The present tense includes the past tense and the past

tense includes the present tense; and

- (b) The singular includes the plural and the plural includes the singular.

8. If any responsive information is not available in the form requested, please provide the available information or documents which best respond to the interrogatory.

9. These interrogatories apply to all responsive information and documents in your possession, custody and control, or in the possession, custody or control of your attorneys, witnesses or other agents, from all files, wherever located, including active and inactive files and including electronic files.

10. If any responsive information or document is not in your possession, custody or control, but you know or believe that it exists, please identify the information or document and indicate to the best of your ability the location and custodian of the information or document.

11. If any document responsive to any of these interrogatories has been destroyed or is otherwise unavailable, please identify and describe:

- (a) The subject matter and content of the document;
- (b) All persons involved in the destruction or removal of the document;
- (c) The date of the document's destruction or removal; and
- (d) The reasons for the destruction or other unavailability of the document.

12. If you assert any claim of privilege or discovery immunity in response to any interrogatory, please identify each document withheld and state:

- (a) The document's title and type;
- (b) The privilege or immunity claimed and the basis for claiming such privilege or immunity;
- (c) Each person who prepared, signed or transmitted the document;
- (d) Each person to whom the document, or any copy of the document was addressed or transmitted;
- (e) The date of the document; and
- (f) The subject matter of the document.

13. For each response which is generated by a computer or electronic data storage mechanism, please state:

- (a) The name of the file from which the response came;
- (b) How the data are stored (disks, tapes, etc.);
- (c) How the data are transmitted and received; and
- (d) The name of each person who collected the data or entered the data into the computer or electronic data storage mechanism.

14. For any interrogatory with subparts, please provide a complete separate response to each subpart as if the subpart was propounded separately.

15. If information or documents responsive to any of these interrogatories has previously been provided in this proceeding in response to an interrogatory by any participant, please provide a specific cross-reference. There is no need to make a duplicate response.

16. If you perceive any ambiguity in interpreting any interrogatory or any instruction or definition applicable to an interrogatory, please secure a

clarification from counsel for the United States Postal Service as soon as the ambiguity is perceived.

B. Definitions

1. “RAO Initiative” refers to the Retail Access Optimization Initiative as described in the Direct Testimony of James J. Boldt on Behalf of United States Postal Service, and the Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services, both filed on July 27, 2011 in PRC Docket No. N2011-1.

2. “Communication” means any correspondence, contact, discussion or exchange between any two or more persons. The term includes, but is not limited to, all documents, telephone conversations or face-to-face conversations, electronic mail, conferences or other meetings.

3. “Document” means any written, recorded, computer-stored, computer-generated or graphic material however stored, produced or reproduced. The term is to be construed to the full extent of the definition in Rule 34 of the Federal Rules of Civil Procedure. Any document that is not exactly identical to another document for any reason, including but not limited to marginal notations or deletions, is a separate document.

4. “Each” includes the term “every” and “every” includes the term “each.” “Any” includes the term “all” and “all” includes the term “any.” “And” includes the term “or” and “or” includes the term “and.”

5. “Identify” means to state as follows:

(a) With respect to a document and to the extent that the following

information is not readily apparent from the document itself: (i) the document's title, date, author(s), signer(s), sender(s), addressee(s) and recipient(s); (ii) the type of document (e.g. letter, memorandum, agreement, invoice) its location and custodian; and (iii) a detailed description of its contents or principal terms and provisions.

- (b) With respect to a communication and to the extent the following information is not readily apparent: (i) the time, date and place of the communication; (ii) all maker(s) and recipient(s) of the communication; (iii) the mode of communication; (iv) the subject matter of the communication; and (v) any document generated in connection with the communication.
- (c) With respect to a person and to the extent the following information is not readily apparent: (i) the person's full name; (ii) the person's employer, job title, and a description of the person's current duties and those duties at the time of deletion or destruction; and (iii) the person's business address.

6. "You" and "your" refers to Curt Artery, as indicated by the context of the question.

7. The terms "related to," "relating to" or "in relation to" mean being in any way relevant to, commenting on, consisting of, referring to, composing, comprising, discussing, evidencing, identifying, involving, reflecting, or underlying.

8. The terms “state,” “describe” and “explain” call for answers independent from any documents that are required in response to these interrogatories. Such answers should be in a form (e.g., narrative, tabular) appropriate for a complete response to the interrogatory.

9. “USPS” or “Postal Service” refers to the United States Postal Service, including USPS Headquarters and any subordinate department, division, or office of the USPS, whether at the national, area, district or local level. This definition includes the officers, directors, agents and employees of the United States Postal Service and its Board of Governors.

10. “Your testimony” refers to the Rebuttal Testimony of Curt Artery On Behalf of The National Association of Postmasters of the United States NAPUS-T-2, filed with the Postal Regulatory Commission on September 26, 2011.

QUESTIONS

USPS/NAPUS-T-2-1. Your testimony refers to “the use of the small office variance (SOV) tool as the basis for identifying [P]ost [O]ffices for closure...” To the extent that you contend the Postal Service uses SOV as the basis for a decision to discontinue a particular Post Office, please provide the basis for this contention. Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NAPUS-T-2-2. Before drafting your testimony, did you ever use SOV? What is the date of your most recent use of SOV that occurred before you drafted your testimony? Please also explain in general terms when you have used SOV and for what purposes.

USPS/NAPUS-T-2-3. Your testimony states that “[o]ne of the concerns I have with regard to the SOV is that the system is not periodically updated to integrate new data, and, therefore, is not current or accurate.” What is the basis for this statement? Please provide any documents you relied upon in support of the portion of your testimony quoted above. How often do you understand that it is updated, and how does that compare to what you think is most appropriate?

USPS/NAPUS-T-2-4. Your testimony states that “new scanning technology is not being input into the SOV program.” What is the basis for this statement? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NAPUS-T-2-5. Your testimony states that “[a]lthough new Postal Service programs have the capability to account for current [P]ost [O]ffice activity – both financial and non-financial – the SOV does not.” Please identify the activity included in the term “non-financial” as used in the passage quoted above. What is the basis for the statement in the passage quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NAPUS-T-2-6. Your testimony refers to “deficiencies includ[ing] scanning Express Mail, Priority, parcel, parcel select, parcel return, parcel tracking, cancelling, and premium forwarding.” Please explain the alleged deficiencies you identify in the passage quoted above. How do you believe that the deficiencies can or should be remedied?

USPS/NAPUS-T-2-7. Your testimony states that “[t]he Postal Service fails to use these tools to measure actual workload.” Please identify what is included in the phrase “these tools” as used in the passage quoted above. What is the basis for the statement quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NAPUS-T-2-8. Your testimony states that

SOV also does not capture workload needed to validate ‘Financial Form 1412,’ with regard to Sarbanes-Oxley Act (SOX) compliance. Under SOX, non-automated offices are required to provide handwritten documentation and verification of day-to-day transactions. This data is shown on PS Form 1412. This document is submitted daily to a web-based program, referred to as ‘e-moves.’ The amount of time given under SOV does not reflect the actual time needed to perform this task.

What is the basis for these quoted statements? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NAPUS-T-2-9. Your testimony states that “[i]n sum, [P]ost [O]ffices are not receiving credit for required functions. These include web-based programs, 1412 validation, cancelling mail, scanning, function 4 audits, and caller service.” What is the basis for the statements quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NAPUS-T-2-10. Your testimony states that “...SOV time standards are inconsistent with [P]ost [O]ffices operating within a point-of-service (POS) terminal environment.” What is the basis for this statement? Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NAPUS-T-2-11. Your testimony states “POS offices can track actual time used in completing retail transactions. SOV offices do not have this capability, so they are mandated to follow a one-size-fits-all benchmark.” What is the basis for the statements in the passage quoted above? Please provide any documents you relied upon in support of the portion of your testimony quoted above. What, if any, differences can you identify between those offices for which SOV is used and POS offices?